

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -x

UNITED STATES OF AMERICA :

INDICTMENT

- v. - :

12 Cr.

LEONARD WOLF, :

Defendant. :

12 CRIM 968

- - - - -x

COUNT ONE

The Grand Jury charges:

1. From at least in or about December 2008 through in or about February 2012, in the Southern District of New York and elsewhere, LEONARD WOLF, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, WOLF defrauded an individual into paying him \$10 million by falsely claiming that the money would be used for an investment.

(Title 18, United States Code, Sections 1343 and 2.)

JUDGE KEENAN

USDC SDNY
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DOC #:
DATE FILED DEC 19 2012

FORFEITURE ALLEGATIONS

2. As a result of committing the wire fraud offense charged in Count One of this Indictment, LEONARD WOLF, the defendant, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to:

- a. \$10 million in United States currency; and
- b. the real property located at 755 Bridle Trail Road, Linville, NC 28646.

Substitute Asset Provision

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value;
- or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 18 U.S.C. § 981, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461, to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, including but not limited to the real property located at 4241 N. Walden Place, Tucson, AZ 85750.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)

12/19/12 Brandon McGinty
FOREPERSON

Preet Bharara
PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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12 Cr.

(18 U.S.C. § 1343.)

PREET BHARARA

United States Attorney.

A TRUE BILL

Brendan M. Galtby 12/19/12
Foreperson.

12/19/12
an - Filed Indictment

U.S.M.G.

Judge Netburn